



# California Fair Political Practices Commission

September 23, 1988

Miki Vohryzek-Bolden  
Executive Director  
California Association of  
Councils of Governments  
P.O. Box 808  
Sacramento, CA 95804

Re: 88-366

Dear Ms. Vohryzek-Bolden:

Your letter requesting advice under the Political Reform Act was received on September 22, 1988 by the Fair Political Practices Commission. If you have any questions about your advice request, you may contact John McLean, an attorney in the Legal Division, directly at (916) 322-5901.

We try to answer all advice requests promptly. Therefore, unless your request poses particularly complex legal questions, or more information is needed, you should expect a response within 21 working days if your request seeks formal written advice. If more information is needed, the person assigned to prepare a response to your request will contact you shortly to advise you as to information needed. If your request is for informal assistance, we will answer it as quickly as we can. (See Commission Regulation 18329 (2 Cal. Code of Regs. Sec. 18329).)

You also should be aware that your letter and our response are public records which may be disclosed to the public upon receipt of a proper request for disclosure.

Very truly yours,

*Kathryn E. Loman*  
Diane M. Griffiths  
General Counsel

DMG:plh



# CALIFORNIA ASSOCIATION OF COUNCILS OF GOVERNMENTS

Diversity and Unity

SEP 22 8 21 AM '88

Suite 200, 106 "K" Street  
Sacramento, CA 95814  
(916) 441-5930

Mailing Address:  
P.O. Box 808  
Sacramento, CA 95804

September 21, 1988

## MEMBER AGENCIES

Association of  
Bay Area Governments  
Association of  
Monterey Bay Area Governments  
Butte County  
Association of Governments  
Central Sierra Planning Council  
Coachella Valley  
Association of Governments  
Humboldt County  
Association of Governments  
Kern Council of Governments  
Kings County  
Regional Planning Agency  
Mendocino Council of Governments  
Merced County  
Association of Governments  
Metropolitan  
Transportation Commission  
Sacramento Area  
Council of Governments  
San Benito County  
Council of Governments  
San Bernardino  
Associated Governments  
San Diego  
Association of Governments  
San Joaquin County  
Council of Governments  
San Luis Obispo  
Area Coordinating Council  
Santa Barbara  
Co-Cities Area Planning Council  
Shasta County Regional  
Transportation Planning Agency  
Sierra Planning Organization  
Southern California  
Association of Governments  
Stanislaus Area  
Association of Governments  
Tulare County  
Association of Governments  
Ventura County  
Association of Governments

## CONSTITUTIONAL MEMBERS

County Supervisors Association  
of California  
League of California Cities

John McLean  
Staff Attorney  
Fair Political Practices Commission  
P.O. Box 807  
Sacramento, CA 95804

Dear John:

I am writing to you to request some information on the effects of Proposition 73 on the content of our newsletter. CALCOG is a state association composed of approximately 25 regional councils of governments (COGs). The association receives dues from these COGs to support its operation. The dues are public moneys.

I would like you to answer the following question:

Can our quarterly newsletter include, for instance, an article on the new officers for the association, if the newsletter is mailed to these 25 COGs plus approximately 25 other individuals? In other words, would the mailing to the COGs be considered "intra-agency" and therefore not be included within the definition of "legislative newsletter or other mass mailing" (Government Code Section 89001)?

Please call me if you have any questions about this request. I look forward to hearing from you.

Sincerely,

MIKI VOHRYZEK-BOLDEN  
EXECUTIVE DIRECTOR

MVB:jrc  
0898L



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EXECUTIVE DIRECTOR

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## Memorandum

To : File

Date : October 12, 1988

From : Fair Political Practices Commission  
John G. McLean

Subject: Advice Request No. T-88-366

Spoke today with Miki Vohryzek-Bolden. Advised her that mass mailing provisions apply only to mailings of more than 200 pieces. Also advised her that mailings which consist only of mailings sent in the normal course of business from one governmental entity or officer to another governmental entity or officer are not prohibited. Sent her an advice letter (I-88-275) which I felt addressed some of the concerns she was raising.

JGM:ld:T88366